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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

E-FIELD - 11/21/05

ANDREA Z. CHRISTIAN,

PLAINTIFF

VS.

LUCILLE PACKARD CHILDREN'S
HOSPITAL,

Defendant.

CASE NO. C04-2744 RMW
DECLARATION, STIPULATION,
AND ORDER
EXTENDING TIME FOR
FILING THE OPPOSITION AND
REPLY AND FOR HEARING
THE MOTION FOR SUMMARY
JUDGMENT

PRESENT TIME FOR MOTION

Date: December 2, 2005

Time: 9:00 a.m.

Crtrm.: 6

Judge: Hon. Ronald M. Whyte

DECLARATION OF JANE B. MOORE

I, JANE B. MOORE, hereby declare:

1. I am the attorney for the Plaintiff in this case, Andrea Z. Christian. I am the attorney responsible for opposing the motion for summary judgment.

2. I am requesting an extension of time to respond to the motion. I am requesting that

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Plaintiff's Declaration, Stipulation and Order Requesting An Extension of Time

1 my opposition be due on November 18, a week after the current due date of November 11.
2 Defendant's reply would then be due on November 25rd. December 9th, with permission from
3 the court, would then be the date for the hearing for the motion.

4 3. I am unable to meet that deadline because of two (2) events:

5 a. During the weekend of October 29, when I would have been first reviewing and then
6 outlining my opposition, I was ill with some type of flu. I was unable to begin work on my
7 opposition.

8 b. Additionally, I was in an automobile accident on October 22. I have soft tissue
9 injuries as a result. I cannot sit for long periods of time, and I am required to spend time in
10 treatment. Both of these factors result in my taking longer to complete my work.

11 4. I have provided this declaration to Mr. Laurenson, the attorney for the plaintiff.

12 I declare under penalty of perjury that the above declaration is true and correct and is
13 based upon my personal knowledge. Executed in Berkeley, California.

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15 Date: _November 9, 2005

_____/s/_____
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JANE B. MOORE,
Attorney for Plaintiff

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6 **STIPULATION**

7 Pursuant to FRCivP 6 and Civil L.R. 6-1, 6-2, and 7-12, the parties stipulate, and the
8 Court hereby orders, as follows:

9 1. Plaintiff has until November 18 to file her opposition to the motion for summary
10 judgment;

11 2. Defendant has until November 25 to file his reply to Plaintiff's opposition;

12 3. December 9, at 9:00 a.m., is the date and time for the hearing on Defendant's motion
13 for summary judgment.

14
15 Dated: November 9, 2005

_____/s/_____
16

17 Michael A. Laurensen,
Attorney for Defendant

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19 Dated: November 9, 2005

_____/s/_____
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21 Jane B. Moore
22 Attorney for Plaintiff
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ORDER

THE FOREGOING STIPULATION
IS APPROVED AND IS SO ORDERED.

Dated: 11/21/05

/S/ RONALD M. WHYTE

Ronald M. Whyte,
U.S. District Court Judge

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Plaintiff's Declaration, Stipulation and Order Requesting An Extension of Time